

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

YELLOW CORPORATION, *et al.*,¹

Debtors.

Chapter 11

Case No. 23-11069 (CTG)

Re: Docket No. 1750

**CERTIFICATION OF COUNSEL REGARDING
AGREED ORDER GRANTING ROBERT MOSS AND KELLY CREPEAULT
LIMITED RELIEF FROM THE AUTOMATIC STAY**

The undersigned counsel hereby certify as follows:

1. On January 16, 2024, the Movants filed *Robert Moss and Kelly Crepeault's Motion for Relief from the Automatic Stay to Send Letters to California Labor Workforce Development Agency* [Docket No. 1750] (the "Motion for Relief")².

2. On February 7, 2024, the above-captioned debtors and debtors in possession (collectively, the "Debtors") filed the *Debtors' Objection to Robert Moss and Kelly Crepeault's Motion for Relief from the Automatic Stay to Send Letters to the California Labor and Workforce Development Agency* [Docket No. 2109] (the "Objection").

3. On February 12, 2024, the Movants filed the *Motion of Robert Moss and Kelly Crepeault for Leave to File and Serve a Late Reply in Support of the Motion for Relief from the Automatic Stay to Send Letters to the California Labor and Workforce Development Agency* [Docket No. 2145].

4. A hearing at which the Court will consider the Motion for Relief and Objection is

¹ A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors' claims and noticing agent at <https://dm.epiq11.com/YellowCorporation>. The location of the Debtors' principal place of business and the Debtors' service address in these chapter 11 cases is: 11500 Outlook Street, Suite 400, Overland Park, Kansas 66211.

² Capitalized terms used but not defined herein have the meaning provided in the Motion for Relief.

scheduled for February 14, 2024, at 11:00 a.m. (the “Hearing”).

5. The Parties have negotiated in good faith to resolve the Objection to the Motion for Relief and have reached the terms of a resolution. The Parties agree to the limited relief set forth in the *Agreed Order Granting Robert Moss and Kelly Crepeault Limited Relief From the Automatic Stay* (the “Agreed Order”), attached hereto as **Exhibit 1**.

WHEREFORE, the Parties respectfully request entry of the Agreed Order at the earliest convenience of the Court.

Dated: February 13, 2024

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/s/ Siena B. Cerra

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